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Before the
U.S. Department of Transportation
Federal Highway Administration

Office of Motor Carriers
Standards Division
" Mandatory Minimum Training
Requirements for Operators of Longer
Combination Vehicles (LCVs) "
Docket No. MC-92-10

Comments of

United Parcel Service
March 16, 1993

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See Attachments in
Supp Info File

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COMMENTS TO BE FILED WITH THE US DOT

United Parcel Service, (UPS) appreciates the opportunity to file comments in answer to the advance notice of proposed rulemaking (ANPRM), published by the Federal Highway Administration, (FHWA), docket number MC-92-10, 'MANDATORY MINIMUM TRAINING REQUIREMENTS FOR OPERATORS OF LONGER COMBINATION VEHICLES, (**LCVs**)."

UPS operates the largest commercial fleet of vehicles in the United States. Presently we have 76,500 drivers, of which over 12,000 operate vehicles over 26,000 (GVW). UPS has 2,499 drivers that are qualified to operate **LCVs**. UPS refers to their drivers of vehicles of over 26,000 (GVW) as "Feeder **Drivers**". Many in this category operate Rocky Mountain and Turnpike Doubles as well as triples.

Within the UPS culture the word training is synonymous with all operations. In large part, UPS credits its training as being essential and necessary to the success of its employees and the company. We believe our training curriculum enhances the safety of the motoring public and our employees.

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When analyzing the UPS safety record for LCV operations, all of the data and evidence supports the praiseworthy safety record of **LCVs**. These types of vehicles have traveled hundreds of millions of miles and achieved per mile safety records that exceed all other types operated by UPS.

In the states where UPS operates triples, a permit process is in place. Most states require the carriers to train and document the training the drivers receive. UPS firmly believes that its training and re-training practices are contributing factors to the safety record of **LCVs**. Formal training in the operation of LCV equipment at UPS dates back to 1969.

The success and historical safety record of this training speaks for itself. During 1991, UPS drivers drove over **658,201,530** miles in vehicles exceeding 26,000 GVW. Our accident frequency was .31 per million miles in total. Over the last five years our accident frequency for triple operations was one DOT reportable accident for every 10.5 million miles or 1.0 per million miles. Annual mileage exceeds 15 million and over 75 million miles of highway exposure for the five year period.

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Since the initial feeder training manual was introduced in 1969, it has had four major revisions. These revisions have been prompted by experience and by changes in laws and regulations governing the operation of commercial vehicles.

Further revisions have also become necessary due to additional configurations of equipment used at UPS; such as the introduction of triples into the UPS system.

Driver trainers are assigned based upon their successful training and qualifications at our UPS Driver Trainer school. UPS trainers are re-certified every two years. All training is monitored and verified by our National School and re-certification is controlled by a corporate audit team. UPS maintains this is more than adequate. All training is documented on the Record Of Feeder Driver Training Form (U6354). See attachment "A".

UPS training of LCV driver candidates is rigorous. The schedule exceeds 100 hours for drivers who have already experience operating a commercial vehicle. The 100 hours is separated into structured and on-the-job training.

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The structured training includes; on-road training, on-property training and classroom training.

The on-the-job training week includes a minimum of five complete consecutive shift-long rides with a UPS driver-trainer. The driver-trainer makes observations and conducts demonstrations to the driver on each ride. All training rides are documented on the Feeder Driver Record of Safety Ride Form (U6356). See attachment "B". All training forms are reviewed and signed by the trainee, the trainer, center manager, division manager and the safety manager.

To train a UPS delivery driver to become a qualified feeder driver costs an average of \$6,445 per trainee.

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QUESTIONS AND ANSWERS

Q. #1. As used by the motor carrier industry for many years, the term LCV means any CMV with two trailers (either of which is over 28 1/2 feet long) or CMV combinations with more than two trailers, irrespective of length. Vehicle weight plays no part in the industry use of the term. Should the definition of LCV that will be used to develop a training requirement be expanded to include vehicles not covered by the **ISTEA**, such as multiple trailer combinations operating with a gross weight of less than 80,000 pounds, i.e. "twin trailers" or "western **doubles**"? In addition, the FHWA wishes to determine whether vehicles operating under special permit at weights over 80,000 pounds and/or straight trucks pulling single or multiple trailers with overall lengths in excess of 72' should be included in those vehicles used to establish a LCV training requirement.

A. #1. To remove the element of doubt, the FHWA should use the definition as noted in the **ISTEA** legislation regarding **LCVs**. That is the LCV training requirements should be applied only to combinations of two or more cargo carrying units which have a gross weight greater than 80,000 pounds.

Q. #2. What difficulties would the **ISTEA** definition create from an enforcement standpoint, and distinguishing which vehicles meet the definition in determining what drivers must comply with any LCV training requirements.

A. #2. UPS believes that triple operation under permit, should apply to all such operations regardless of weight. UPS further believes the FHWA DOT has a mechanism in place to verify the safety and maintenance of carriers, this process should allow them to monitor training of LCV drivers. UPS would be required, as we are now, to maintain as record of LCV training.

Q . #3. Once the training requirements for LCV drivers are established, what should the **FHWA's** role be in ensuring that the training is actually carried out according to the minimum standards?

A. #3. UPS feels that through the compliance review process, an LCV carriers' records could be checked to see if all training, or documentation of training is kept on file. At UPS, all training is documented on the standard "Feeder/Driver Record of Safety Ride Form" (016356). These forms are reviewed by three different management people at United Parcel Service and signed off, approving that this training has been done and documented.

Q. #4. What standards are necessary to ensure that an instructors, who would be the key to the efficiency and effectiveness of the LCV training, have been adequately and properly trained and are carrying out their training responsibilities in an acceptable manner?

A. #4. UPS driver trainers are certified based upon their training and qualifications at our UPS Driver Trainer School in South Holland, Illinois. Trainers are recertified every two years. All training is documented on the "Record of Feeder Driver Training **Form**" (U6356).

The certification of driver trainers could be wrapped into the compliance review process, meaning that documentation and a record of all the training and re-training that is given to a carrier's driver trainer is kept on file for the review or audit purposes of FHWA.

Q . #5. Since LCV operations are allowed only under special state oversized -- overweight permits, should the initial licensing of LCV instructors and certification of LCV drivers be accomplished by a federal (FHWA or other) state agency? How should this be accomplished?

A. #5. UPS believes that each carrier should be held responsible for certification and recertification of their triples drivers and driver trainers. UPS would not support a mandatory federal or state licensing certification of triple trainers and triple drivers. As a practical matter, the expertise in LCV driver training presides with motor carriers. We feel that federal or state certification of LCV driver training is unworkable and unnecessary.

Q. #6. From an enforcement perspective, what specific federal, state or local agency should have responsibility for ensuring that the requirements of LCV training are met and what form of documentation should be established to prove to prospective employers that adequate LCV training has been successfully completed by a driver? Who would be held accountable if the training requirements were not met, the individual and/or the motor carrier?

A. #6. At UPS all training is documented on the "Record of Feeder Driver Training **Form**" (U6356), if the DOT, through their compliance review process would like to review this form, it would be made available to them. This form includes all the pertinent information, such as; training location, the instructor, drivers experience with driving this type of equipment, etc.

We further believe that if we could integrate this training or this documentation of proof of training in with the CDL, it would benefit the federal and state inspectors. But, at this time, there is no way to integrate any type of additional endorsement on the CDL.

The carriers, if need be, could offer a card identifying the location, the date of training, the name of carrier and years of experience in driving the **LCVs** in the form of a card, the drivers could carry with them, which should be recognized by all jurisdictions. As technology is evolving, the CDLIS systems could be utilized to help in this area of locating or identifying the drivers that have been trained and the carriers that are employers of these drivers.

UPS perceives their training for LCV drivers as adequate and should be grandfather into any future requirements.

Q. #7. Should the non-profit, private organizations, such as PTDIA, be authorized to evaluate and certify the adequacy of LCV training programs?

A. #7. The PTDIA should be commended for the excellent work they have undertaken and programs they have put in place to assist motor carriers with bringing their training programs up to par.

UPS believes, that if a motor carrier does not have the resources to provide the drivers with an adequate training program, the PTDIA would be an option to that carrier. We also believe that the motor carrier who would like to start a partnership with PTDIA, to assure the carrier that they are doing the right thing, or have the right training programs in place, then that would be a great idea. UPS believes the programs we have in place, the training curriculum we have in place, is sufficient and can be directly related to the safety record for our LCV operations. In regard to the mandatory audits, we think that the FHWA should still be in control of the enforcement of these programs.

Q. #8. What types of LCV driver training programs exist?

A. #a. See attached copy of United Parcel Service's driver training program. Attachment "C"

Q. #9. Should the implementation of minimum training requirements for LCV operators be **"phased in"** over a certain period of time? If so, what scenario do you propose and why?

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A. #9. At UPS, we feel that training is very important, and that our current standards should meet or exceed any mandated standard established by this rulemaking. However, We feel that all carriers should be given two years advanced notice of the training requirements.

Q. #10. Should LCV training be a prerequisite for a double/triple trailer endorsement on a CDL?

A. #10. UPS drivers are highly qualified. Careful screening and selection is important during driver selection and qualification. UPS Triple trailer drivers must meet UPS, federal and state guidelines. UPS Triple trailer driver requirements are probably impracticable for many carriers. In most cases, UPS Triple trailer candidate must have five years tractor trailer experience, three years of safe driving and be at least 25 years of age. Recent calculations reveal that to train a UPS delivery driver to become a qualified feeder driver, cost an average of \$6,445. per trainee. Realizing that triple trailer combinations are only permitted to operate in 16 states, it would cost UPS an unreasonable amount of money to train drivers that never operate LCVs.

Q. #11. Should all LCV drivers be required to have previous experience with single trailer vehicle? If so, how much.

A. #11. UPS's triples driver training program was designed as part of our total trainer certification process. While we may continue to require that our own driver candidate possess certain UPS standards, we believe that a federal standard of two years' verifiable commercial truck driving experience is workable and enforceable within the trucking industry.

Q. #12. How often should LCV training be offered, repeated for both the instructors and drivers?

A. #12. UPS driver trainers must have successfully completed the UPS driver trainer school course to be a certified trainer of double or triple trailer drivers at UPS. This certification must be renewed at a minimum of every two years. This recertification must be done by a qualified person who themselves, has been recently certified or recertified at our driver training school in South Holland, Illinois. The recertification process must include a demonstration by the trainer of the basic methods and procedures of training a driver.

Namely: pre-trip and coupling of the tractor and trailers used in UPS operations. A demonstration of on-road operations; including explanation and commentary of the ten point commentary and the five keys in space and visibility. Recertification must include the trainer demonstrating their ability to observe, detect and correct driver's error using correct terminology. Recertification must include the trainer completing a general knowledge quiz, covering such topics as DOT regulations, defensive driving, and equipment parts and accessories.

At UPS, our drivers of **LCVs** are re-trained every quarter. A certification ride is accomplished by having a driver trainer ride with the driver for the entire shift. These rides occur every quarter. Each observation of the driver's ability to operate these vehicles last an average of **8-10** hours per ride. While we support this procedure it may be impracticable for many carriers.

Q. #13. Do specialized vehicle combinations such as triples, or those handling special cargo, require different training standards?

A. #13. The **ISTEA** definition of **LCVs** should be the only vehicle used in determining what types of training the drivers of these vehicles should be given. In no way, should the cargo which is being transported determine training standards. We feel the cargo has no bearing or impact on their training of the drivers of **LCVs**.

United Parcel Service appreciates the opportunity to help in the fact gathering process for determining what the minimum training standards should be for drivers of **LCVs**.

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